

Exhibit A

Atkinson Baker, a Veritext Company
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOR GEVORKYAN on behalf of himself
and all others similarly situated,

Plaintiffs,
vs.

CERTIFIED COPY

CASE NUMBER:

3:18-cv-07004-JD

BITMAIN, Inc..., BITMAIN TECHNOLOGIES, Ltd
and DOES 1 to 10

Defendants.

The videotaped deposition of Gang Ren taken on behalf of the Plaintiff, for all purposes permitted by Civil Rules of Procedure; all formalities waived, including the reading and signing of the deposition; before LaTasha Bethel, Certified Court Reporter, 2660, in and for the State of Georgia; commencing on September 2nd, 2021 at 5:00p.m., via Zoom.

Atkinson-Baker, a Veritext Company
www.depo.com
800-288-3376

Gang Ren
September 02, 2021

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2

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18

19 ALSO PRESENT:

20 THE VIDEOGRAPHER THE INTERPRETER

21 JOSEPH BUSSINO VO HUANG
ATKINSON-BAKER, ATKINSON-BAKER

22

23 THE CHECK INTERPRETER

24 JENNY KONG

25

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1 Q. What is your degree in?

2 A. My degree is in electronic information engineering. It
3 is about the electronic circuit designing.

4 (Technical discussion had off the written record.)

5 Q. What is your work history starting from the time that
6 you got out of college?

7 A. After I graduated from university I started working for
8 Samsung Electronics. It was Samsung China Electronics located in
9 Tianjin, China. I worked in the department of electronic circuit
10 development and designing for about twelve to thirteen years.

11 I left Samsung Electronics in 2018. After that I joined
12 Bitmain Technology.

13 Q. What was your first job -- was that in 2018 that you
14 started working for Bitmain?

15 A. The first job that I had was the management and the
16 administration of servers.

17 Q. How long did you do that for?

18 A. I did that for approximately six to seven months.

19 Q. Was your next job also with Bitmain?

20 A. Yes.

21 Q. What year did you start the next job?

22 A. To be precise, that was in December of 2018 or January
23 of 2019.

24 Q. What was that job?

25 A. At that time I got transferred to the chip development

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1 department and in that department I got involved in the
2 development and management of chip building or chip making.

3 Q. And that was for Bitmain Technologies Limited?

4 A. I was working in the Beijing operation of Bitmain.

5 Q. Which entity did you work for?

6 A. I worked for Bitmain Technology Beijing in China.

7 Q. This is when you worked in the chip development
8 department beginning in 2018 you worked for Bitmain Beijing; is
9 that correct?

10 A. As a matter of fact I joined Bitmain Technology in 2018
11 but initially I worked in, as I told you, the server development.
12 That was for the overall operation. Then I got transferred to
13 the chip development division of the same company.

14 Q. In both cases we are talking about Beijing Bitmain
15 Technology. Is that the name of the company?

16 A. It was in the Bitmain Beijing, yes.

17 Q. Did you come to a point where you left that position?

18 THE INTERPRETER: Counsel, the witness' audio was cut
19 off just for, like, a split of a second. May I ask him to
20 repeat what he just said?

21 MR. MARLBOROUGH: Yes, of course.

22 THE WITNESS: In around July of 2019 I was transferred
23 to another department.

24 MR. MARLBOROUGH:

25 Q. You were transferred to another department with Beijing

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1 Bitmain Technologies?

2 A. Yes.

3 Q. And what department was that?

4 A. To provide management and maintenance service for the
5 employees who provide service to servers.

6 THE CHECK INTERPRETER: Translation dispute.

7 MR. LAZATIN: I am sorry. There is a dispute about the
8 translation.

9 THE CHECK INTERPRETER: I suggest that the witness just
10 said, at first I was working for the management of a team
11 who provides the operation and also maintaining services of
12 our mining servers and my job is to manage those who do this
13 job.

14 MR. LAZATIN: Do you disagree, Mr. Huang?

15 THE CHECK INTERPRETER: I am sorry, I would like to
16 correct. It is the management for the team building of
17 maintenance and operation of mining farms.

18 THE INTERPRETER: Counsel, this is from Bo Huang the
19 interpreter.

20 MR. MARLBOROUGH: Yes, sir.

21 THE INTERPRETER: I am not trying to argue over the
22 differences on translation. I am just wondering if it is
23 proper for the check interpreter's statement to be on the
24 record because I am court certified and my translation
25 stands. Maybe -- I mean it happens from time to time that

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1 mining farms?

2 A. Yes.

3 Q. When we refer to mining farms we are referring to ASIC
4 devices? And that is A-S-I-C.

5 A. ASIC machines. In our company we call it Antminer.

6 Q. What is your last word?

7 A. Well, to the outside people probably refer to it as
8 ASIC machine but in our company we call it Antminer.

9 Q. Oh, Antminer?

10 A. Antminer, yes. Or mining server.

11 MR. LAZATIN: Just for clarification it is Antminer
12 like the insect. Antminer.

13 BY MR. MARLBOROUGH:

14 Q. How long did you do that job for?

15 A. Let me see. I think I worked on this job for over one
16 year, more than one year.

17 Q. What was the next job that you did?

18 A. In April of 2021 I became the superintendent of
19 Department 3 of product benefit realization. That is what we
20 call it.

21 Q. And was your employer Beijing Bitmain Technologies?

22 A. Yes.

23 Q. What were your responsibilities as superintendent for
24 the department of product realization?

25 A. Our job in this department is to identify the features

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1 of some of the products that were to be introduced to the R&D --
2 development for R&D so that they may be marketed to customers.

3 Q. Are you still in that position?

4 A. Yes.

5 Q. You understand Beijing Bitmain Technologies to be a
6 different company than Beijing -- excuse me. I'm going to
7 rephrase the question.

8 You understand that Beijing Bitmain Technologies to be a
9 different company than Bitmain Technologies Limited?

10 MR. LAZATIN: Objection to form. Calls for legal
11 conclusion. Objection, vague and ambiguous.

12 THE WITNESS: I don't know what question you are asking
13 me but I can tell you that I worked for Beijing Bitmain
14 which is an independent entity.

15 BY MR. MARLBOROUGH:

16 Q. Are you familiar with an entity named Bitmain
17 Technologies Limited?

18 A. We go like this, normally when we refer to Bitmain
19 Technology we refer to it as Bitmain Hong Kong.

20 Q. Have you ever worked for Bitmain Hong Kong?

21 A. No.

22 Q. Do you have knowledge of the operations of Bitmain Hong
23 Kong?

24 A. I have a rough idea about Bitmain Hong Kong.

25 Q. Do you currently hold any other positions with any

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1 Bitmain entities?

2 A. No.

3 Q. Are you an executive of Beijing Bitmain?

4 MR. LAZATIN: Objection, vague.

5 THE WITNESS: Well, it is true that counsel is
6 ambiguous about the definition of the term executive, but I
7 can tell counsel that I am a member of the management of
8 Bitmain Beijing.

9 BY MR. MARLBOROUGH:

10 Q. Are you a member of the management of Bitmain Hong
11 Kong?

12 A. No.

13 Q. Are you a board member of any Bitmain entity?

14 A. You mean a board member, no. I am not.

15 Q. Just to be clear I am referring to a member of the
16 board of directors.

17 A. (No translation given.)

18 Q. Did any of your supervisors or anyone above you at
19 Beijing Bitmain tell you to appear for this deposition?

20 A. I am sorry. Counsel, can you please repeat the
21 question?

22 Q. Sure. Did any of your superiors direct you to
23 participate in this deposition?

24 MR. LAZATIN: Objection, vague and ambiguous.

25 THE WITNESS: No.

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1 BY MR. MARLBOROUGH:

2 Q. You don't understand the question?

3 MR. LAZATIN: Objection, asked and answered.

4 THE WITNESS: Counsel, you just asked me if I have been
5 directed by any of my superiors to appear for the deposition
6 and my answer is, no.

7 BY MR. MARLBOROUGH:

8 Q. How is it that you heard about the opportunity to
9 participate in this deposition?

10 A. It was a Max Hua who asked me if I would like to
11 participate in it. I said, yes. So here I am today.

12 Q. Can you spell the name of Max Hua?

13 A. Max Huang. Max is M-A-X, Huang, H-U-A-N-G. No. Let
14 me take that back. That is not correct. Hua is H-U-A. Sorry.

15 Q. Does Max not work for Beijing Bitmain?

16 A. Max is the person in charge of the legal affairs for
17 Hong Kong Bitmain.

18 Q. What did Max tell you about the appearance at this
19 deposition?

20 A. Max told me that as far as discovery is concerned, due
21 to the pandemic outbreak we cannot travel to the United States,
22 however, we can go to Korea. He asked me if I would be willing
23 to come over to Korea for this. I agreed to that. He then
24 briefed me a bit about the background about the case.

25 Q. What did he tell you?

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1 Q. I did not receive an answer to my earlier question.
2 Are you represented in your individual capacity or as an
3 employee of Beijing Bitmain?

4 MR. LAZATIN: Objection. Vague and ambiguous, calls
5 for legal conclusion.

6 THE WITNESS: Honestly, I don't understand the
7 difference between being represented as an employee of a
8 company and as an individual.

9 THE CHECK INTERPRETER: Translation dispute. I think
10 the exact word is, I don't know -- I really don't know how
11 the person represented or the company represented by a
12 lawyer is defined in law. What is the difference how they
13 are defined.

14 MR. MARLBOROUGH: I am going to ask that the microphone
15 of the other translator be turned off until we can resolve
16 this issue. Particularly where there is a concern about
17 witness coaching.

18 Do you agree to that, Carlos?

19 MR. LAZATIN: I do not understand the concern about
20 witness coaching. She disagreed with the translation. She
21 gave her alternate translation. Mr. Huang can accept it or
22 reject it, we can proceed subject to that objection. I do
23 not understand the coaching issue.

24 BY MR. MARLBOROUGH:

25 Q. Where did you obtain your knowledge about Bitmain Hong

1 Kong?

2 A. I had access to Bitmain Hong Kong's information during
3 my work, during my communication with my coworkers.

4 Q. What information do you have access to about Bitmain
5 Hong Kong?

6 A. Counsel, what information concerning Bitmain Hong Kong
7 do you want to know?

8 Q. I am interested in knowing what information you have in
9 what categories about Bitmain Hong Kong as a person who is not an
10 employee of the company?

11 MR. LAZATIN: I am going to object. It is also
12 argumentative.

13 THE INTERPRETER: Counsel, the witness' audio is a bit
14 choppy.

15 MR. MARLBOROUGH: Okay. We can repeat the question to
16 him. I am sorry. I did not understand your signaling.

17 THE INTERPRETER: I was just trying to let you know
18 that the witness did answer the question. I heard only a
19 part of it because his audio became a bit choppy. I wanted
20 him to repeat what he said.

21 MR. MARLBOROUGH: I appreciate that. Can you repeat
22 the question to him just so we're clear he's got the
23 question?

24 THE INTERPRETER: Yes. (Speaks in Mandarin.)

25 THE WITNESS: All right. I would like to give you an

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1 account of what I know about Bitmain Hong Kong.

2 MR. MARLBOROUGH: Please do.

3 THE WITNESS: Bitmain Hong Kong is a company that is
4 incorporated in Hong Kong which is subject to the laws and
5 regulations of Hong Kong. I also have certain knowledge
6 about its operation in Hong Kong. For instance, it is
7 involved in the chip business. In our industry we call it
8 wafer. The purchasing and supply of wafer business that
9 this company handles.

10 THE CHECK INTERPRETER: Translation dispute. I just
11 would like to add one more information that Mr. Huang just
12 missed. Wafer is a kind of raw material of the chips.

13 MR. MARLBOROUGH: Did the witness say all of these
14 words -- because -- Mr. Translator, did the witness say all
15 the words that she just spoke?

16 THE INTERPRETER: The witness did not say those words.
17 The witness said waiver or wafer.

18 THE CHECK INTERPRETER: (Speaks in Chinese.)

19 THE INTERPRETER: Why don't you say that in English and
20 put it on the record because our court reporter cannot write
21 down what you said.

22 THE CHECK INTERPRETER: Mr. Huang, why can't we just
23 confer together with the witness. The witness cannot speak
24 English so we can talk with him in Chinese to make sure that
25 he makes [unintelligible].

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1 THE INTERPRETER: By the rules, if we do that we have
2 to do that off the record. I don't mind talking to you off
3 the record but we are on the record at the moment so we have
4 to stay by the rule, right?

5 THE CHECK INTERPRETER: Yeah.

6 THE INTERPRETER: Once we stop recording -- once the
7 court reporter stops taking down what is said I can talk to
8 you in casual conversations but at this moment I can't.
9 Sorry.

10 MR. LAZATIN: Ms. Kong, can you just state what the
11 wrong term is, see if Mr. Huang agrees and let's proceed,
12 okay?

13 THE CHECK INTERPRETER: Okay.

14 MR. LAZATIN: What was the incorrectly translated term?

15 THE CHECK INTERPRETER: Mr. Huang, I think you
16 mentioned the -- it is not the operation and the maintenance
17 relating to the chip but it is the supply and the purchase
18 work of the raw material of the chips which is wafer. That
19 is the only part.

20 BY MR. MARLBOROUGH:

21 Q. Do you know any of the board members of Bitmain Hong
22 Kong?

23 MR. LAZATIN: Mr. Huang was in the middle of deciding
24 whether he agreed or disagreed with the translation
25 correction.

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1 or permits but we can proceed.

2 THE WITNESS: So, I am allowed to answer the question,
3 am I?

4 MR. MARLBOROUGH: Yes -- I am sorry. That is his
5 lawyer's job to say that. Carlos, is he allowed to answer
6 the question?

7 MR. LAZATIN: Yes.

8 THE WITNESS: As I testified previously it was Max who
9 was the person in charge of legal affairs of Hong Kong, He
10 asked me if I would like to attend this deposition and I
11 agreed to that and I understand that to be the
12 authorization.

13 BY MR. MARLBOROUGH:

14 Q. Is Max associated with Beijing Bitmain?

15 MR. LAZATIN: Objection, vague.

16 THE WITNESS: What do you mean by, associated? In what
17 respect do you mean?

18 BY MR. MARLBOROUGH:

19 Q. Does he work for Beijing Bitmain?

20 A. He is the person in charge of legal affairs in Hong
21 Kong and currently he is also the CFO of our Bitmain group.

22 Q. So he is the CFO of what Bitmain group?

23 A. He is the CFO of our Bitmain headquarters located in
24 Haidian.

25 THE CHECK INTERPRETER: I would like to make a

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1 correction here. This group should be translated as Bitmain
2 Cayman parenting company, not parent holder.

3 BY MR. MARLBOROUGH:

4 Q. Is he in charge of legal affairs for Beijing Bitmain?

5 A. No.

6 Q. Is he in charge of legal affairs for Bitmain Hong Kong?

7 A. Yes.

8 Q. And he is in charge of legal affairs for the Beijing --
9 Bitmain holding company; is that correct?

10 A. Counsel, are you asking if he is also in charge of the
11 legal affairs of Bitmain Beijing holding?

12 Q. That was the latest question.

13 MR. LAZATIN: I am going to object to the terminology
14 as vague and ambiguous.

15 THE WITNESS: I can answer you by saying that he is in
16 charge of the legal matters in Hong Kong Bitmain.

17 BY MR. MARLBOROUGH:

18 Q. For Bitmain Hong Kong, right. I am asking you about
19 Bitmain holding company?

20 MR. LAZATIN: Objection, vague.

21 THE WITNESS: No, he is not.

22 BY MR. MARLBOROUGH:

23 Q. Is he chief financial officer of any other Bitmain
24 entities other than Bitmain Hong Kong?

25 A. I just said that he is the CFO of our Cayman company.

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1 Q. Is the Cayman company Bitmain's holding company?

2 MR. LAZATIN: Objection. Vague, legal conclusion.

3 THE WITNESS: The relationships among these companies
4 you may check that out. We call it Cayman Bitmain but as to
5 whether it is a holding company or not, all you have to do
6 is to check that out online.

7 BY MR. MARLBOROUGH:

8 Q. And you do not know the answer to that yourself; is
9 that correct?

10 MR. LAZATIN: Objection. Vague and ambiguous,
11 argumentative.

12 THE WITNESS: It goes like this, Cayman Bitmain is the
13 headquarters of our Bitmain -- let me take that back.

14 Cayman Bitmain is the headquarters of the holding
15 company of our Bitmain companies.

16 THE CHECK INTERPRETER: Correction. I think it would
17 be better if we just translate Cayman Bitmain is the holding
18 company of the Bitmain companies in China.

19 BY MR. MARLBOROUGH:

20 Q. I am going to ask you to look at Mr. Starr's video. He
21 is going to put on the screen what we have previously marked as
22 Exhibit 2.

23 (Documents referred to were marked for identification as
24 Plaintiff's Exhibit 2.)

25 MR. STARR: Can everyone see my screen?

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1 MR. LAZATIN: Give me one second.

2 THE VIDEOGRAPHER: Counsel, did you want to go off the
3 record?

4 MR. MARLBOROUGH: Yes. Let's go off the record.

5 THE VIDEOGRAPHER: We are now going off the record.

6 The time is approximately 8:00 PM and the end of File Number
7 2.

8 (Off the record at 8:09 PM.)

9 (On the record at 8:14 PM.)

10 THE VIDEOGRAPHER: We are now going back on the record.
11 The time is approximately 8:14 PM. The beginning of File
12 Number 3.

13 Counsel, please proceed.

14 MR. MARLBOROUGH: I just want to confirm Mr. Lazatin is
15 back. Carlos, are you here?

16 We are going to go off the record again. Yes, let's
17 just go off the record again.

18 THE VIDEOGRAPHER: We are now going off the record.

19 The time is approximately 8:14 and the end of File Number 3.

20 (Off the record at 8:14 PM.)

21 (On the record at 8:17 PM.)

22 THE VIDEOGRAPHER: We are now going back on the record.
23 That time is approximately 8:17. The beginning of File
24 Number 4.

25 Counsel, you may, please, proceed.

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1 BY MR. MARLBOROUGH:

2 Q. Do you know if Bitmain Singapore has ever received
3 revenue from the sale of Bitmain devices, Antminer devices in the
4 United States?

5 MR LAZATIN: Objection. Lacks foundation, calls for
6 speculation.

7 THE WITNESS: I do not know that.

8 BY MR. MARLBOROUGH:

9 Q. Do you know if Bitmain Hong Kong has ever received
10 revenue from the sale of ASIC devices in the United States?

11 THE WITNESS: To my knowledge sometimes to enter into
12 contracts with overseas clients Bitmain Hong Kong is used.

13 THE CHECK INTERPRETER: Correction. I think maybe we
14 can just translate, I know previously Bitmain Hong Kong used
15 to be an entity who signed overseas sales contracts with our
16 clients.

17 BY MR. MARLBOROUGH:

18 Q. Has Bitmain Singapore ever signed overseas contracts
19 with companies in the United States for the sale of Bitmain ASIC
20 devices?

21 A. I don't know.

22 Q. Did you say that Bitmain Hong Kong in the past received
23 revenue from contracts with companies in the United States for
24 the sale of Bitmain ASIC devices?

25 MR. LAZATIN: Objection. Asked and answered.

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1 THE WITNESS: As I said, the Hong Kong company is the
2 main body that enters into contracts with overseas clientele
3 for the purchase of the equipment. I believe the funds by
4 the overseas clientele have been made to the Hong Kong
5 company although I have not personally seen the money
6 flowing to Bitmain Hong Kong but I believe that has
7 happened.

8 BY MR. MARLBOROUGH:

9 Q. Do you believe that money from the sale of ASIC devices
10 in the United States is paid directly to Beijing Bitmain
11 Technologies?

12 A. No. I do not believe so.

13 Q. Do you know a company named Bitdeer?

14 THE INTERPRETER: Counsel, can you repeat the question,
15 please.

16 MR. MARLBOROUGH: Do you know a company named Bitdeer,
17 B-I-T-D-E-E-R.

18 MR. LAZATIN: Objection. Outside the scope,
19 foundation.

20 THE WITNESS: Bitdeer, I have heard about it.

21 BY MR. MARLBOROUGH:

22 Q. Is it a company that is part of the Bitmain family of
23 companies?

24 MR. LAZATIN: Objection. Vague, ambiguous,
25 speculation.

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1 THE WITNESS: Let me tell you what I know about it.
2 Bitdeer used to be our Bitmain company's project. It was
3 not an independent entity. Later on it got spun off of
4 Bitmain and became an independent company and that no longer
5 has any connections to us.

6 BY MR. MARLBOROUGH:

7 Q. What does Bitdeer do?

8 A. Let me stand corrected. Maybe I committed an error in
9 my previous testimony.

10 Before Bitdeer left Bitmain, whether it was a project or
11 whether it was one of the companies, I do not know that for sure.
12 What I am pretty positive about is that after it divorced from
13 Bitmain it has become an independent company.

14 Q. Thank you for the clarification. What does Bitdeer do?

15 A. Bitdeer is a mining platform.

16 THE CHECK INTERPRETER: Bitdeer is a platform for
17 [unintelligible].

18 BY MR. MARLBOROUGH:

19 Q. Are you familiar with the term NCSA?

20 A. NCSA, what do you mean?

21 Q. Are you familiar with the phrase North Central South
22 America in relation to Bitmain Hong Kong?

23 MR. LAZATIN: Objection. Vague, lacks foundation.

24 THE WITNESS: I don't know what you're talking about.

25 I don't know what relationship you are talking about.

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1 BY MR. MARLBOROUGH:

2 Q. Do you know if the sales regions relating to the sale
3 of Bitmain Antminer devices are broken up by geographical region?

4 MR. LAZATIN: Objection. Vague, ambiguous.

5 THE WITNESS: Are you talking about the revenue of
6 sales being broken up or different personnel being in charge
7 of different regions?

8 BY MR. MARLBOROUGH:

9 Q. Different personnel being in charge of different
10 regions?

11 A. The normal case is that different regions are handled
12 by different people, however, sales in different regions happen
13 to be intertwined with one another. For instance, salespeople in
14 charge of China may get to know clients who are interested in
15 purchasing the equipment in Russia or Central Asian areas. So
16 these people who are in charge of China may also make sales to
17 those peoples in those regions. So the regions are not very
18 strictly divided.

19 Q. Do the salespeople who handle sales in the United
20 States work for Bitmain Hong Kong?

21 MR. LAZATIN: Objection, vague.

22 THE INTERPRETER: Counsel, can I ask the witness to
23 repeat his answer because his answer was cut off in the
24 middle?

25 MR. MARLBOROUGH: Yes.

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1 THE WITNESS: The sales employees are the employees of
2 Bitmain Beijing.

3 BY MR. MARLBOROUGH:

4 Q. And if they sell Bitmain Antminer devices that money
5 goes to Bitmain Hong Kong; correct?

6 A. Like I previously testified to, I have not seen the
7 flow routes of the funds but I feel or I believe that the sales
8 revenue should be wired to Hong Kong if the contract is executed
9 by Hong Kong.

10 Q. And a salesperson for a contract like that would
11 usually be a Beijing Bitmain employee?

12 MR. LAZATIN: Objection. Vague, incomplete
13 hypothetical.

14 THE WITNESS: As I said previously, the employees
15 handling the sales are the employees of Bitmain Beijing.

16 BY MR. MARLBOROUGH:

17 Q. Does Bitmain Hong Kong share employees with Bitmain
18 Beijing?

19 A. No.

20 Q. Does Bitmain Hong Kong share executives with Bitmain
21 Beijing?

22 MR. LAZATIN: Objection, vague.

23 THE WITNESS: Most of these two companies have their
24 own management personnel.

25 BY MR. MARLBOROUGH:

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1 Q. Is there any overlap with management personnel between
2 the two companies?

3 MR. LAZATIN: Objection. Asked and answered.

4 THE WITNESS: The founder of our company, Mr.

5 Wu Jihan used to be on the board of both Bitmain
6 Beijing and Bitmain Hong Kong but other than Mr. Wu there
7 are other board members on the board of Bitmain Beijing such
8 as Ge Yue Sheng, Zhou Feng, these people do not overlap with
9 the management personnel in Hong Kong, if you know what I am
10 talking about.

11 BY MR. MARLBOROUGH:

12 Q. Is Jihan Wu the only board member that is overlapped
13 between Bitmain Hong Kong and Beijing Bitmain?

14 MR. LAZATIN: Objection. Asked and answered.

15 THE WITNESS: Before you ask this question, counsel,
16 would you please clarify the timeframe you refer to?

17 BY MR. MARLBOROUGH:

18 Q. At any time since September of 2015?

19 A. If you are talking about anytime since 2015 September I
20 will tell you that in 2018 Mr. Wu Jihan served on both the boards
21 of Beijing as well as the board of Hong Kong, however, there were
22 other members of the board of Beijing. For instance, the
23 chairman of the board Mr. Zhan Ke Tuan and there was other board
24 members. I think I mentioned Zhou Feng and Ge Yue Sheng. This
25 Zhou Feng and Ge Yue Sheng that I referenced are not on the board

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1 of Hong Kong.

2 THE COURT REPORTER: Would you provide the spellings
3 when you get to them, please?

4 THE INTERPRETER: Yes. The first is Z-H-O-U, F-E-N-G.
5 The second is G-E, Y-U-E, S-H-E-N-G.

6 BY MR. MARLBOROUGH:

7 Q. Do you know Luyao Liu (phonetic)?

8 A. Yes, I do.

9 Q. Was he an executive of Bitmain Hong Kong?

10 A. Yes. Mr. Luyao Liu used to be a director of the
11 investment department of Bitmain Hong Kong.

12 Q. When you say director do you mean a member of the board
13 of directors.

14 MR. LAZATIN: Objection. Misstates testimony.

15 THE WITNESS: No. He was the chief of that investment
16 and the financing department.

17 BY MR. MARLBOROUGH:

18 Q. Was Luyao Liu also an executive of Beijing Bitmain?

19 A. No.

20 Q. Was Luyao Liu also an executive of the holding company?

21 MR. LAZATIN: Objection, vague.

22 THE WITNESS: The holding company that you referenced,
23 are you talking about the Cayman company?

24 MR. MARLBOROUGH: Yes.

25 THE WITNESS: To my knowledge Luyao Liu used to be a

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1 member of the board of the Cayman company.

2 BY MR. MARLBOROUGH:

3 Q. What involvement, if any, does Bitmain Hong Kong have
4 with the Bitmain website?

5 THE INTERPRETER: Counsel, did you say Bitmain Webtop?

6 MR. MARLBOROUGH: I will clarify -- yes. The Bitmain
7 website?

8 THE WITNESS: Which website do you refer to?

9 BY MR. MARLBOROUGH:

10 Q. Bitmain.com.

11 A. Bitmain.com is a website maintained and operated by the
12 employees of Bitmain Beijing.

13 Q. Can someone go to the Bitmain.com website and order an
14 ASIC Antminer device from Bitmain Hong Kong?

15 MR. LAZATIN: Objection. Vague, assumes facts.

16 THE WITNESS: There is no order that is made on this
17 website which goes to Hong Kong.

18 THE CHECK INTERPRETER: I think the translation should
19 be I myself have never made such an order directly to Hong
20 Kong from this website.

21 THE INTERPRETER: Let me clarify that with the witness.

22 THE WITNESS: Are you asking me if an order made on the
23 Bitmain website would go to Hong Kong Bitmain; right?

24 BY MR. MARLBOROUGH:

25 Q. If the order goes to Hong Kong Bitmain; correct?

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1 A. Well, first of all I want to say, no. And I have no
2 experience in which I place an order online and the order is
3 going to Hong Kong.

4 Q. Where did the orders go?

5 MR. LAZATIN: Objection, vague.

6 THE WITNESS: When you try to place an order on
7 Bitmain.com you will see online where the order is directed
8 to.

9 BY MR. MARLBOROUGH:

10 Q. And where is that?

11 MR. LAZATIN: Objection. Vague and ambiguous.

12 THE WITNESS: Counsel, the question is indeed vague and
13 ambiguous. We previously talked about different regions.
14 So in different regions there are different recipient bodies
15 so I do not know how to answer your question.

16 BY MR. MARLBOROUGH:

17 Q. Did you take the advice of your lawyer by using the
18 term vague and ambiguous in response to my question after your
19 lawyer objected on the basis of vague and ambiguous?

20 MR. LAZATIN: Excuse me. Objection. The question is
21 argumentative and will you please not raise your voice to
22 the witness. It is rude. It is totally improper.

23 THE WITNESS: Counsel, your question as to whether I
24 took advice from my attorney, the answer is, no, because
25 your question was indeed very overbroad.

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1 MR. MARLBOROUGH: I insist that Mr. Lazatin stop
2 coaching the witness.

3 MR. LAZATIN: I am not coaching the witness.

4 MR. MARLBOROUGH: By making more objections than are
5 necessary to protect the record. You can object on the
6 basis of form.

7 MR. LAZATIN: I am going to again object to commentary
8 of counsel as to the nature of my objections. They are
9 entirely proper under Rule 30 which calls for a short brief
10 statement on the grounds for the objection and that is
11 exactly what I have done.

12 BY MR. MARLBOROUGH:

13 Q. On what website are orders placed for customers to
14 order Bitmain devices in the United States?

15 A. www.bitmain.com.

16 Q. What company receives those orders?

17 A. So the question is if an order is placed online by a
18 client, who receives the order.

19 To my knowledge once an order is placed online Bitmain
20 Beijing receives this order and in turn Bitmain Beijing will
21 instruct the production company to make the shipment.

22 Q. And who receives the revenue from that order?

23 A. Like I previously said, I have not seen in which
24 account the client deposits the payment. So I am not able to
25 tell you that.

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1 Q. How does Bitmain Hong Kong make its money?

2 MR. LAZATIN: Object as lacking foundation, beyond the
3 scope of the deposition.

4 THE WITNESS: By asking how Bitmain Hong Kong makes
5 money, are you asking me how Bitmain Hong Kong generates
6 revenue?

7 MR. MARLBOROUGH: Correct.

8 THE WITNESS: I don't quite know from where it receives
9 revenue.

10 BY MR. MARLBOROUGH:

11 Q. And it could be from website orders?

12 A. I have already told you that I have not seen which
13 client made a payment to it. So I am not able to speculate on
14 that, if you know what I am talking about.

15 Q. What company ships out Antminers in response to an
16 order on the Bitmain website?

17 A. It is by a company or a subsidiary company under our
18 Bitmain which is called Shenzhen (phonetic) Intelligence Cloud
19 Core.

20 Q. What company handles repairs for the service of Bitmain
21 devices in the United States?

22 A. That is determined by the clients. Whichever company
23 that the client chooses to go is up to the client.

24 Q. Who provides the repair centers for Antminer devices in
25 the United States?

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1 MR. LAZATIN: Objection, assumes facts.

2 THE WITNESS: I previously said that was not much
3 subject to our decision. It is subject to the decision of
4 the clients. Whichever company that the clients prefer to
5 go to, they may go there.

6 BY MR. MARLBOROUGH:

7 Q. Are you familiar with any Bitmain repair centers?

8 MR. LAZATIN: Objection, vague.

9 THE WITNESS: Bitmain, there are no repair companies
10 for Bitmain in the United States. The repair companies are
11 owned by Bitmain.

12 BY MR. MARLBOROUGH:

13 Q. Does Bitmain provide information about Bitmain repair
14 centers on its website?

15 MR. LAZATIN: Objection. Outside the scope and lacks
16 foundation.

17 THE WITNESS: Counsel, have you seen it from somewhere?

18 MR. MARLBOROUGH: I am sorry. You are not the person
19 to be asking questions. I am asking you the questions.

20 THE WITNESS: Please why don't you translate for me.
21 What I meant to say counsel is that if, Counsel, has seen it
22 somewhere I would like him to show me that so that I can
23 answer his question pointedly. But without that, I don't
24 know how to answer such a generalized and overbroad
25 question.

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1 THE INTERPRETER: Yes. (Speaks in Mandarin.)
2 THE WITNESS: Could you please tell counsel,
3 Mr. Interpreter, that I am not refusing to answer his
4 question. I have answered every question he has asked me,
5 however, as I said, I am looking at an isolated description
6 over here. The identity of this company cannot be
7 ascertained.

8 MR. MARLBOROUGH: Let's move on to page 5.

9 BY MR. MARLBOROUGH:

10 Q. The screen with green walls, do you recognize this
11 office?

12 A. No, I don't.

13 MR. MARLBOROUGH: Let's go to the second part of that
14 page.

15 BY MR. MARLBOROUGH:

16 Q. Do you recognize that address?

17 THE WITNESS: Would you, please, translate that to me?

18 THE INTERPRETER: Yes, I will.

19 THE WITNESS: What do you mean by whether I recognize
20 it or not?

21 BY MR. MARLBOROUGH:

22 Q. Have you seen that address before?

23 A. First of all let me tell you this, I have not been to
24 this address. I have not seen this address but I do know that we
25 have a company located in San Jose, United States.

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1 Q. Do any employees of any of the Bitmain entities -- I am
2 going to strike that question.

3 Which company operates from an office in San Jose?

4 A. I know that Bitmain, Inc.. which has been incorporated
5 in San Jose is operating there.

6 Q. Did you know that before you prepared for this
7 deposition?

8 A. Yes.

9 Q. Do you recognize the email address?

10 A. I know this email account. I know that this email
11 account is for the group of sales reps in the United States or in
12 North American regions.

13 Q. Who do they work for?

14 MR. LAZATIN: Objection, outside the scope.

15 THE WITNESS: I already talked about that. These sales
16 representatives are the employees of Bitmain Beijing.

17 BY MR. MARLBOROUGH:

18 Q. Previously you told me that you did not know what NCSA
19 was; isn't that correct?

20 A. I meant to tell you that in certain specific contexts
21 like this one, this is an email account. It says sales NCSA. In
22 this context I do recognize it but when you just single out four
23 alphabets NCSA to me I do not know what that refers to.

24 MR. MARLBOROUGH: Okay. I'm going to ask Manny to put
25 up the exhibit with the purchase order.

1 MR. STARR: (Complied.)

2 BY MR. MARLBOROUGH:

3 Q. Do you recognize this document?

4 MR. LAZATIN: Sorry. Objection. Lacks foundation and
5 I object to any questioning about this document which is
6 entirely in English without a Chinese translation being
7 provided.

8 THE WITNESS: Counsel, the question to your question
9 is, no. I do not recognize it.

10 BY MR. MARLBOROUGH:

11 Q. Do orders from the Bitmain website result in the
12 production of commercial invoices?

13 MR. LAZATIN: Objection. Vague, foundation.

14 THE WITNESS: I cannot tell.

15 BY MR. MARLBOROUGH:

16 Q. What is the entity listed on the company stamp?

17 MR. LAZATIN: Objection. Lacks foundation, calls for
18 speculation and the document speaks for itself.

19 THE WITNESS: So the question asks me what the seal is.
20 First of all, I do not know where this document comes from
21 and I cannot tell by looking at this document which company
22 this seal represents.

23 BY MR. MARLBOROUGH:

24 Q. Do you have reason to believe that it is a company
25 other than Bitmain Hong Kong?

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1 Kong in 2015.

2 Q. 2016?

3 A. I do not know about 2016 either.

4 Q. 2017?

5 A. I do not know about 2017 because I did not join the
6 company yet at that time.

7 Q. When did you join the company?

8 MR. LAZATIN: Objection, asked and answered.

9 THE WITNESS: I answered this question, counsel, in the
10 morning session. I joined Bitmain in 2018.

11 BY MR. MARLBOROUGH:

12 Q. My understanding is that you testified that you have
13 never been an employee of Bitmain Hong Kong; is that correct?

14 A. Correct.

15 Q. So when you say you joined the company, you have never
16 joined the company Bitmain Hong Kong, which is the question I
17 asked about the number of employees; is that correct?

18 A. Objection. Misleading, mistakes his testimony.

19 THE WITNESS: Well, please make sure to translate
20 thoroughly what I am about to say so that there is not going
21 to be any misunderstanding.

22 In the morning session I said that I joined Bitmain
23 Beijing in 2018 and then counsel asked me the number of
24 employees in Bitmain Hong Kong in 2017 and I said I don't
25 know because back then I did not join Bitmain yet. So

1 counsel should not confuse the two with each other.

2 BY MR. MARLBOROUGH:

3 Q. In 2018 how many employees did Bitmain Hong Kong have?

4 A. For the year of 2018 to my knowledge there were
5 supposed to be about 30 employees.

6 THE CHECK INTERPRETER: Correction. Maybe you should
7 be -- it would be more accurate to say more than 30
8 employees in 2018.

9 BY MR. MARLBOROUGH:

10 Q. 2019 there were 30 employees or 2018 there were 30
11 employees?

12 A. You asked me about 2018 so my answer was in response to
13 2018.

14 BY MR. MARLBOROUGH:

15 Q. How many Bitmain employees were there in 2019? Let me
16 clarify. How many Bitmain HK employees were there in 2019?

17 A. Seems that back in 2019 there were 20-plus employees.

18 Q. How many Bitmain HK employees were there in 2020?

19 A. I believe there were around 10 in 2020.

20 Q. How many Bitmain HK employees were there in 2021?

21 A. In the year of 2021 the employees in Hong Kong that I
22 know are two.

23 Q. How many Bitmain HK employees were there outside of
24 Hong Kong in 2021?

25 A. Does that comprise or does that cover the people on

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1 business trips? What do you mean by outside of Hong Kong?

2 Q. You said that there were two employees that you know of
3 in 2021 in Hong Kong.

4 A. Yes.

5 Q. Are you saying at Bitmain Hong Kong -- at Bitmain Hong
6 Kong?

7 A. Yes.

8 Q. What did these two employees do for Bitmain Hong Kong?

9 A. One is working on legal matters while the other one is
10 working on investment and the financing related matters.

11 Let me supplement my answer. The employee who is working on
12 legal matters may also engage in some other job responsibilities
13 such as communication with TSMC of the wafer, purchasing matters.

14 Q. Is that Max who you referred to earlier in this
15 deposition?

16 A. That is correct. A Max is the individual that is in
17 charge of the legal affairs in Hong Kong, yes.

18 THE INTERPRETER: Counsel, just a moment please. This
19 is from the interpreter to the court reporter. TSMC, I
20 wonder if you got that?

21 THE COURT REPORTER: Yes, sir.

22 THE INTERPRETER: Okay. TSMC, thank you. Okay, go.

23 BY MR. MARLBOROUGH:

24 Q. How many employees does Beijing Bitmain have currently?

25 A. Are we talking about this very moment in 2021?

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1 Q. Yes.

2 A. Well, I do not know an exact number but I will say at
3 least four to five hundred or five to six hundred employees.

4 Q. How many of them work in the United States?

5 MR. LAZATIN: Objection. Vague and ambiguous, assumes
6 facts.

7 THE WITNESS: Counsel, do you mean the people who
8 travel to the United States on business or else? What do
9 you mean by the people working in the United States?

10 BY MR. MARLBOROUGH:

11 Q. How many people travel to the United States on business
12 would be the first question.

13 MR. LAZATIN: Objection. Lacks foundation.

14 THE WITNESS: For this year at this moment the ones who
15 are in the United States on business should be five or six.

16 BY MR. MARLBOROUGH:

17 Q. How many work in the United States all the time?

18 MR. LAZATIN: Objection. Lacks foundation, assumes
19 facts.

20 THE WITNESS: Counsel, would you please define how long
21 is all the time?

22 BY MR. MARLBOROUGH:

23 Q. How many people, if any, are stationed to work in the
24 United States on a regular basis?

25 MR. LAZATIN: Objection. Assumes facts, lacks

1 foundation.

2 THE WITNESS: By saying stationed do you mean that they
3 work, live, all year-round in the United States?

4 BY MR. MARLBOROUGH:

5 Q. They work in the United States more than six months a
6 year?

7 A. I don't believe there is any. I don't believe anybody
8 works for that long a period of time over there.

9 Let me put it this way, I have not seen anyone who has
10 worked on business matters in the United States for so long.

11 Q. Do Beijing Bitmain employees who travel to the United
12 States use the San Jose office of Bitmain, Inc. to perform their
13 work?

14 MR. LAZATIN: Objection. Foundation, speculation.

15 THE WITNESS: When they travel to the United States on
16 business it is possible that they use that office in San
17 Jose depending on their job duties. It is also possible
18 that they do not go to that office to work but that is
19 dependent upon the job duties that they perform over there.

20 Q. How many Beijing Bitmain employees work in the United
21 States in 2018?

22 MR. LAZATIN: Objection. Asked and answered and
23 assumes facts.

24 THE WITNESS: Well, in terms of computation of how many
25 people, counsel, that is subject to how you define the

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1 people who travel to the United States. For instance,
2 during a one-year period of time, which is quite a lengthy
3 period of time, people may go to the United States for one
4 trip, return back and then go there again. So it is up to
5 how you define that number of people or the number of trips
6 and I have not done math on that subject so I am not able to
7 provide you the statistics.

8 BY MR. MARLBOROUGH:

9 Q. You know someone named Peng Li (phonetic)?

10 A. No, I don't.

11 THE CHECK INTERPRETER: The answer is I do not know a
12 person who is named Li Peng (phonetic).

13 BY MR. MARLBOROUGH:

14 Q. Do you know anyone at Bitmain named Peng?

15 A. Peng, how do you spell that?

16 Q. P-E-N-G. Any current or former employee named Peng?

17 A. Counsel, could you, please, show me how the character
18 is written?

19 MR. MARLBOROUGH: Let's pull up Exhibit 6.

20 MR. STARR: (Complied.)

21 BY MR. MARLBOROUGH:

22 Q. Do you know this person?

23 (Picture referred to was previously marked as Plaintiff's Exhibit
24 6 for identification.)

25 A. Yes. I know this individual but his name is Li Peng

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1 BY MR. MARLBOROUGH:

2 Q. Sure. Do you see right above that yellow line? Do you
3 see the word San Jose?

4 A. Who puts the words in there or what? How come there is
5 San Jose on it?

6 Q. I am asking you if she worked in the San Jose office?

7 MR. LAZATIN: Objection. Lacks foundation and it has
8 been asked and answered.

9 THE WITNESS: When she travels to the United States on
10 business maybe she goes to that office in San Jose, maybe
11 she does not go there.

12 BY MR. MARLBOROUGH:

13 Q. Do you have any idea why Bitmain employees would
14 numerous times represent that they work in San Jose?

15 THE INTERPRETER: Counsel, can you repeat the question,
16 please? Your audio cut out.

17 BY MR. MARLBOROUGH:

18 Q. Do you know why Bitmain Beijing employees -- multiple
19 Bitmain Beijing employees would represent that they work in the
20 San Jose office?

21 MR. LAZATIN: Objection. Lacks foundation, calls for
22 speculation and assumes facts.

23 THE WITNESS: I don't. In addition to that counsel
24 just stated that multiple employees of Bitmain Beijing claim
25 that they worked out of the San Jose office. How do they

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1 claim that they work out of the San Jose office?

2 BY MR. MARLBOROUGH:

3 Q. Did you not see that Peng Li profile that indicated
4 that he worked in San Jose?

5 MR. LAZATIN: Objection. Misleading, misstates the
6 document.

7 THE WITNESS: The word San Jose does appear on this
8 webpage but that does not necessarily mean that he works out
9 of that office. When he is on a business trip then maybe he
10 stops by that office.

11 MR. MARLBOROUGH: Let's look at Exhibit 5.

12 (Documents referred to were previously marked for identification
13 as Plaintiff's Exhibit 5.)

14 BY MR. MARLBOROUGH:

15 Q. Does Bitmain hire sales specialists in the United
16 States? And I am referring to any Bitmain entity who hires sales
17 specialists in the United States.

18 MR. LAZATIN: Objection. Lacks foundation,
19 speculation.

20 THE WITNESS: I don't know if hiring is conducted in
21 the United States.

22 BY MR. MARLBOROUGH:

23 Q. Are people hired to work in the United States by any of
24 the Bitmain entities other than Bitmain Inc..?

25 MR. LAZATIN: Objection. Lacks foundation, calls for

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1 speculation.

2 THE WITNESS: Not responsible for sales. I don't know
3 info related to that.

4 MR. MARLBOROUGH: Can you scroll down, Manny?

5 MR. STARR: (Complied.)

6 MR. MARLBOROUGH: I am going to ask you to translate
7 the line where it says job location San Jose, CA.

8 THE INTERPRETER: (Complied.)

9 MR. MARLBOROUGH: Manny, can you also highlight Nicole
10 Liu.

11 MR. STARR: (Complied.)

12 MR. LAZATIN: I am going to object again to the
13 presentation and questioning on this English-language
14 document. It is a dense document entirely in English and I
15 object on that ground.

16 THE WITNESS: Mr. Translator, would you please
17 paraphrase what this document says to me?

18 BY MR. MARLBOROUGH:

19 Q. I will paraphrase it. This is a job posting
20 purportedly from Bitmain Technologies Limited seeking to employ
21 people at the job location in San Jose, California and the person
22 who is supposed to receive resumes is Nicole Liu at Bitmain.com.

23 MR. LAZATIN: I am going to object. There was no
24 question in that speech but I'm going to object to counsel
25 testifying about the contents of this document and about the

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1 facts, none of which has been established.

2 MR. MARLBOROUGH: He requested that it be paraphrased
3 which I did.

4 BY MR. MARLBOROUGH:

5 Q. Do you know who Nicole Liu is?

6 MR. LAZATIN: Just a minute. To the extent you are
7 saying you paraphrased a very long dense English document
8 with that one sentence of your commentary, I object to that
9 as completely inaccurate and inappropriate and --

10 MR. MARLBOROUGH: At the request of the witness.

11 MR. LAZATIN: He asked [audio distortion] the document.
12 I do not think you communicated one percent of what this
13 document says in your so called paraphrasing. That is what
14 I am objecting to.

15 MR. MARLBOROUGH: I think your speaking objection is
16 inappropriate. Your objection is noted for the record.

17 BY MR. MARLBOROUGH:

18 Q. Who is Nicole Liu?

19 MR. LAZATIN: Objection. Lacks foundation, calls for
20 speculation.

21 THE WITNESS: I do not know this individual and I do
22 not know this email account.

23 MR. MARLBOROUGH: Can you scroll down further, please?

24 MR. STARR: (Complied.)

25 MR. MARLBOROUGH: Can you translate the, about us

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1 THE WITNESS: This website in here is not specified as
2 to which specific website.

3 MR. MARLBOROUGH: Let's go to paragraph 1.

4 BY MR. MARLBOROUGH:

5 Q. Tell me if this clarifies it for you at all.

6 MR. MARLBOROUGH: If you could translate the first
7 sentence of paragraph 1 including the parenthetical.

8 THE INTERPRETER: (Complied.)

9 BY MR. MARLBOROUGH:

10 Q. Sir, there is a question associated with that.

11 MR. MARLBOROUGH: Can the court reporter read the last
12 question back, please?

13 (The court reporter read back the last question.)

14 MR. LAZATIN: Objection. Vague, speculation.

15 THE CHECK INTERPRETER: Correction. I would like to
16 make a supplement to what Mr. Huang just translated because
17 he just missed a very small part in the first sentence in
18 what he translated. He forgot to mention what is inside the
19 bracket. It should be that, in this context, what is in the
20 bracket Bitmain references to Bitmain Hong Kong. So if you
21 would allow I can translate this in Chinese, especially this
22 legal part, to the witness.

23 THE INTERPRETER: Elaborate these based on my personal
24 understanding of the case. I do it word for word whatever
25 that says.

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1 MR. LAZATIN: Mr. Huang, just so we are clear on the
2 record, you translated paragraph 1 and only paragraph 1
3 because it sounded very long?

4 THE INTERPRETER: You are right, counsel.

5 MR. LAZATIN: Thank you. Understood.

6 THE INTERPRETER: By the way, the check interpreter
7 says I missed that small part, which is actually true and I
8 noticed because you what -- on my screen that part is mostly
9 covered by our images because our galleries are on this side
10 that covers that [unintelligible]. That is why I missed it,
11 yes.

12 BY MR. MARLBOROUGH:

13 Q. Do you know what entity operates Bitmain's Facebook
14 page?

15 A. It is operated by Bitmain Beijing.

16 Q. Do you know what entity operates Bitmain's Twitter
17 page?

18 MR. LAZATIN: Objection, vague.

19 THE WITNESS: It is also operated by Bitmain Beijing.

20 BY MR. MARLBOROUGH:

21 Q. Do you know whether sales of Bitmain devices in the
22 United States were made by Bitmain Singapore rather than Bitmain
23 Hong Kong from August 1st, 2018 to sometime after that?

24 THE CHECK INTERPRETER: Correction. Can I just check
25 with Mr. Chris that the time in your question is actually

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1 after August 2018 or after November 2018?

2 MR. MARLBOROUGH: August.

3 THE CHECK INTERPRETER: August, okay.

4 THE INTERPRETER: August. (Speaks in Mandarin.)

5 MR. LAZATIN: Objection. Lacks foundation, speculation
6 and beyond the scope of the authorized deposition.

7 THE WITNESS: First of all, would you please define the
8 timeframe of August 1st, 2018 through what time?

9 BY MR. MARLBOROUGH:

10 Q. For any period from August 2018?

11 MR. LAZATIN: Same objections.

12 THE WITNESS: I don't know.

13 MR. MARLBOROUGH: I am going to look at Exhibit 11.

14 BY MR. MARLBOROUGH:

15 Q. Is this one of the documents that you translated?

16 (Documents referred to were previously marked for identification
17 as Plaintiff's Exhibit 11.)

18 MR. LAZATIN: Can we please show the witness the entire
19 document?

20 MR. MARLBOROUGH: You want us to print it out and email
21 it to you? Print it out -- do you have printing services
22 there, Carlos?

23 MR. LAZATIN: No, Chris. I am saying it is a
24 three-page document. He may not recognize it just from the
25 cover page. In fairness to him can we, please, show him the

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1 STATE OF GEORGIA

2 COUNTY OF DEKALB

3 I hereby certify that the foregoing deposition was reported
4 as stated in the caption and the questions and answers thereto
5 were reduced to writing by me; that the foregoing 113 pages
6 represent a true, correct, and complete transcript of the
7 evidence given on September 2nd, 2021 by the witness, Gang Ren,
8 who was first duly sworn by me.

9 I certify that I am not disqualified for a relationship of
10 interest under O.C.G.A. 9-11-28(c); I am a Georgia Certified
11 Court Reporter here as a representative of Atkinson-Baker, a
12 Veritext Company; I was contacted by Atkinson-Baker, a Veritext
13 Company to provide court reporting services for this deposition;
14 I will not be taking this deposition under any contract that is
15 prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the
16 Rules and Regulations of the Board; and by the attached
17 disclosure form I confirm that Atkinson-Baker, a Veritext Company
18 is not a party to a contract prohibited by O.C.G.A. 15-14-37 or
19 Article 7.C of the Rules and Regulations of the Board.

20 This 17th day of September, 2021,



23 LaTasha D. Bethel Georgia Certificate #2660

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Gang Ren
September 02, 2021